# FINDING OF NO SIGNIFICANT IMPACT CAMPGROUND TRAIL CONSTRUCTION AND FACILITY UPGRADE NATURAL BRIDGES NATIONAL MONUMENT

Natural Bridges National Monument is proposing the construction of a new trail from the campground to the visitor center, upgrading of the campground amphitheater and rehabilitation of the picnic area.

The visitor center is the only location in the park with public water and telephones. Campers who choose not to drive from the campground to the visitor center must walk along the park road, which has a posted speed limit of 25 mph and no shoulder. The proposed trail would eliminate this safety hazard.

The existing amphitheater facility is outdated and in deteriorated condition. Visitors sit on splitlog benches with no back support and there is no lighting along the 200-yard path used by visitors to return to their campsites following evening programs. The projection screen is propped up with metal fence posts to keep it from falling down.

The existing picnic facility is used heavily by visitors. The site consists of three badly worn and warped tables without shade. There are also potential safety hazards created by the deteriorating steps and the access ramp that leads to the tables and garbage cans.

An environmental assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and regulations of the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations (CFR) 1508.0). It analyzes the proposed action and alternatives, and their likely environmental impacts.

#### PREFERRED ALTERNATIVE

#### Trail between the campground and the visitor center

This would be a new trail construction project. The trail would start at the amphitheater on the existing route currently used by park staff, and would end where the visitor center photovoltaic array access trail ties into the service road, approximately .3 miles away. Work would entail formalizing a four foot wide trail with hand and power tools, installing crushed rock for trail tread, and constructing several erosion control structures adjacent to two small drainages. The proposed trail layout was selected to minimize the need for erosion control structures. Erosion control structures to be installed would consist of 6"x 6"x 4" treated timbers. Timbers would be fastened to the ground with \(^3\)4 inch rebar.

### Amphitheater upgrade

The NABR amphitheater project would consist of three elements, (1) Trail lights, (2) New projection screen and (3) New benches.

The first task of this project involves installing a low, ground level lighting system from the trailhead at the campground to the amphitheater. The length of trail is estimated at 600 linear feet. The lights would be solar powered and motion sensitive.

The second element of this project involves removing the existing projection screen and constructing a new one. The design and installation of the new screen would be similar to the old one. In addition to constructing a new screen, a lockable firewood box would be constructed behind the screen.

The third task involves removing the existing benches at the amphitheater and installing new ones. The new benches would be made of a natural wood product and have backrests.

#### Picnic area rehabilitation

The project would entail constructing three new shade structures at the NABR Loop Road picnic area. The structures would use 12' long x8" diameter poles for up rights, 10' long x 10" diameter poles for cross beams, and 14' long x 4" diameter poles for roof members. Poles would set in 12" concrete filled holes or if unable to reach the desired hole depth they would be anchored to 12" x 12" concrete footings. Poles would be fastened to each other with lag bolts.

This project would also include installing three prefabricated, perforated Plastisol coated steel picnic tables. Each table would be covered by a shade structure. One of the three would be wheelchair accessible. Access steps and ramps to the picnic sites would be rebuilt.

#### **ALTERNATIVES CONSIDERED**

One other alternative, a "No Action" alternative, was considered and analyzed in the EA.

No trail would be built between the campground and visitor center. Safety problems created by visitors walking along the road would persist. Impacts caused by social trails around the campground would continue. At the amphitheater, facilities would not be rehabilitated or replaced. Uncomfortable and substandard conditions would remain and worsen. No alterations to the picnic area would occur. Deteriorated steps and tables would remain. Erosion problems would continue.

#### ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that "[t]he environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101:

- 1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- 2. assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- 3. attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- 4. preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- 5. achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- 6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The preferred alternative (Alternative B) is also the "Environmentally Preferred Alternative" under CEQ guidelines. Alternative B would have either neutral or positive effect on each of the 6 elements listed above, with particular benefits in reducing environmental degradation and improving visitor safety and health. Alternative B also promotes elements 1 through 6 of the CEQ Guidelines by meeting NPS trustee responsibilities to assure future generations of opportunities for beneficial uses of the environment, while preserving resources and balancing use. Alternative A, the "no action alternative", would fail to meet CEQ objectives in a number of areas, particularly elements #2 and #3. Safety issues would not be addressed, and environmental degradation would continue.

## WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

The following criteria were considered in determining whether or not the proposed action would have significant impacts, and thereby require preparation of an Environmental Impact Statement (EIS):

#### SIGNIFICANCE CRITERIA

#### 1. Impacts that may be both beneficial and adverse:

The preferred alternative will not impact prime and unique farmlands, air quality, environmental justice, socioeconomic environment, floodplains, wetlands, natural soundscapes, land use, special status species, or cultural resources. A number of beneficial impacts were identified for the preferred alternative, and any adverse impacts to soils, visitor use and experience, wildlife and vegetation were determined to be of negligible to moderate intensity and mostly short term.

Approximately 7,560 square feet of previously undisturbed cryptobiotic soil between the campground and visitor center would be disturbed by the trail project. The two other proposed projects are not going to involve new ground disturbance. Standard methods to reduce erosion will be employed during and after construction, including but not limited to re-vegetation, mulching, ditching, and other control techniques.

The three projects would directly impact not more than 0.2 acres of potential wildlife habitat. 7,560 square feet of the trail between the campground and visitors center would be in a previously undisturbed area. Wildlife inhabiting this area would be disrupted to varying degrees by the trail construction and the subsequent human presence in the area. Most individuals would adapt to the new situation quickly, or move to an area of less disturbance.

To construct the trail the area will be closed to visitor use for the duration of the project, estimated to be 9 weeks. The trail is being built in an area that is usually closed to visitors. The supplies to be used for the trail and amphitheater projects will be staged at one of the campground sites, closing the specific site to the public. Some construction noise may be heard in the campground during the day.

For the amphitheater upgrade, the project area will be closed to the visitor use for the duration of the project, estimated to be 5-9 weeks. This will impact visitors since the amphitheater will be unavailable for formal evening interpretive programs. In the past, average attendance at evening programs was 10 to 20 visitors, seven days a week. NPS staff will determine alternatives as to

where to conduct evening programs during this time period. One of the campground sites will be used to stage supplies for this and the new trail project. Some construction noise may be heard in the campground during the day.

For rehabilitation of the picnic area, the project area will be closed to visitor use for the duration of the project, estimated to be 9 weeks. The area has three tables and is generally used by non-camping visitors. Picnic tables will be made available near the visitor center during the closure.

#### 2. The degree to which public health and safety are affected.

The preferred alternative will have positive effects on public health and safety by correcting the following situations:

Campers who choose not to drive from the campground to the visitor center must walk along the park road, which has a posted speed limit of 25 mph and no shoulder. Drivers are often reluctant to cross over the road centerline and consequently pass very close to those walking along the road edge. Additionally, since this section of road is not flat, drivers coming over the rise are often surprised by the presence of pedestrians, leaving them limited time to react. The proposed trail would eliminate this safety hazard.

The existing amphitheater facility is outdated, uncomfortable and unsafe. Visitors sit on split-log benches with no back support and there is no lighting along the 200-yard path used by visitors to return to their campsites following evening programs.

The existing picnic facility now consists of three badly worn and warped tables without shade. There are also safety hazards created by the deterioration of steps and the access ramp that leads to the tables and garbage cans.

#### 3. Any unique characteristics of the area.

No unique characteristics were identified for the project site or vicinity.

#### 4. The degree to which impacts are likely to be highly controversial.

No controversial impacts were identified during scoping or as a result of public review of the EA.

5. The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.

No highly uncertain impacts or unique or unknown risks were identified.

6. Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

The proposed action establishes no precedent for future actions with significant effects, and does not represent a decision in principle about a future consideration.

7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts.

The EA assessed cumulative effects for each impact topic, and found that the proposed action is not related to other actions that may have individual insignificant impacts but cumulatively significant effects.

8. The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

No historic properties are associated with the proposed action. No other significant scientific, archeological or cultural resources were identified for the site.

9. The degree to which an action may adversely affect an endangered or threatened species or its critical habitat.

No adverse effects were identified for any endangered, threatened or sensitive species or designated critical habitat. The U.S. Fish and Wildlife Service has been consulted.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The proposed action does not violate any federal, state, or local law or requirements imposed for the protection of the environment.

#### **IMPAIRMENT**

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the proposal will not constitute an impairment to the resources of Canyonlands National Park. This conclusion is based on a thorough analysis of the environmental impacts described in the EA, the opportunity for public comments, relevant scientific studies and data, and the professional judgement of the decision maker, guided by the direction provided in *NPS Management Policies* (December, 2000). Impacts of the preferred alternative on park resources are expected to be both negative and positive, confined to the site of new disturbance, of short to long term, and of minor to moderate intensity. In all cases these impacts are the result of actions taken to preserve or restore other park resources and values. The severity, duration and timing of impacts associated with this alternative, and their direct, indirect and cumulative effects do not constitute impairment of park resources and values, and will not violate the NPS Organic Act.

#### PUBLIC INVOLVEMENT

A press release outlining the proposed projects and requesting public comment was sent out February 27, 2002, and was published in four local newspapers. No scoping comments were received.

An environmental assessment was made available for public review and comment for a 30-day period beginning April 29, 2002. Notice of availability was published in local newspapers and a copy of the EA was posted on the park internet website. One letter was received during the comment period (see appendix 1).

#### **CONCLUSION**

The preferred alternative does not constitute an action that normally requires preparation of an EIS. The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or on other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommend	led:	
	Superintendent	Date
Approved:		
	Intermountain Regional Director	Date

#### **APPENDIX 1**

#### RESPONSE TO PUBLIC COMMENTS

One letter was received during the public comment period for the EA. The writer made a number of management suggestions that covered subjects outside the scope of the EA. These comments will be addressed in a separate response to the writer. The following comments appeared to be directly related to the alternatives proposed in the EA:

**Comment 1.** "Are these improvements needed or relevant? For example, virtually all people staying in the campground have flashlights and may not need a lighted walkway. How many nights a year are campground programs presented? During my recent visit in early May 2002 no evening programs were advertised on the bulletin board by the fee station, even though the campground was full every night. Does the scant need of this improvement justify the cost?"

Response: Programs are presented nearly every night for the months of June, July, and August, and are presented occasionally on weekends during the spring and fall. This results in a total of about 100 programs per year in the amphitheater. While most camping groups may have a flashlight available, often each individual of a group does not. In addition, because programs generally start in daylight but end after dark, campers sometimes forget to bring a light with them to the amphitheater. The NPS feels the increased safety afforded by the low-profile lighting system justifies the project.

**Comment 2.** "Walking from the campground to the Visitor Center to use telephones and get water is offered [as] a reason for building a trail. However, the outdoor water supply is turned off for the winter when the first freeze is anticipated and not turned on again until danger of frost is passed in the spring. Therefore, water is not available during the low use season, that is, about six months of the year. This existing outdoor water source could be refitted with a frost free spigot to ensure year long availability of water for campers and day use visitors. The current method of obtaining water off-season from the restrooms is not very satisfactory."

Response: Advantages and disadvantages of replacing the present hydrant faucet with a frost free design will be considered.

**Comment 3.** "A trail to the Visitor Center is offered as an action to reduce soil compaction in the campground. During my recent visit I observed that soil compaction and erosion in the campground has worsened since my last visit a year ago. The environmental assessment is right to address this problem. However, it is my belief that building a trail from the campground to the Visitor Center will do little to lessen soil compaction and erosion."

Response: The NPS agrees that soil compaction and erosion in the campground is a problem that will not be solved solely by creation of the trail. Direct intervention in the form of campsite maintenance and general rehabilitation of the area is needed, as well. This work will be accomplished as time and funding permits.